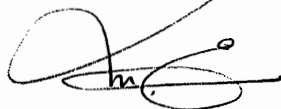


COMPLAINT

1. **ORIGINAL COMPLAINT DATED NOVEMBER 24, 2016 IS ATTACHED.**
2. **FININCIAL DAMAGES DUE TO WRONGFUL CONTRACT EMPLOYMENT TERMINATION IS ATTACHED.**

EXHIBIT "A"

Pages "8" including this page

A handwritten signature in black ink, appearing to be "J. S.", written over a horizontal line.

9.4.17

MEMORANDUM

November 24, 2016

Prepared By: Murad Qayyum

Ref.: SERIES OF EVENTS

Accused Party:

Steve Brda: DOS/OBO Project Director – Karachi Pakistan

Steve Foster: DOS/OBO Construction Manager – Karachi Pakistan

SRC Inc.: 3rd Party DOS/OBO Contractor – Karachi Pakistan

Aggrieved Party: Murad Qayyum – SRC Inc. Employee / 3rd Party Contractor

Witnessed Party: Nisar Alvi – SRC Inc. Employee / 3rd Party Contractor

Location of Incident: United States and Karachi Pakistan

1. October 2, 2015

First unexpected statement from Steve Brda was made quote, **"The only reason you are here because of your Pakistani Origin"**. Another SRC employee Nisar Alvi was the witness and he heard this statement loud and clear.

2. October 15, 2015

Upon Steve Brda's request, I walk with him to inspect the new OBO field office. I raised the question that this field office will not last longer due to selection of poor quality material and deficiencies in the design. First time he raised his voice on me.

3. November 2015

During Building foundation construction, he requested me to stay late at site and provide coverage to general contractor Epik. He accused me that I am entering more time than actual. He inquired from Epik's project manager Hakan Arnas. He responded to him that Murad is coming and leaving the site with Epik.

Additionally, during late work hours, I try to reach him several times on the mobile phone and want to report to him about work activities. He never responded to my phone call. This can be verified from both phone logs. Refer to the attached overtime log (7-hours are still outstanding and unpaid)

4. Town Hall Meeting with Ambassador & Consular General

Steve Foster instructed me that 3rd party contractor are not allowed to attend town hall meetings. In fact all 3rd party contractor was attending these meeting except me. I told him that I am cleared American citizen and holding active Top Secret. He refused to discuss further and walked away from me. I informed Steve Brda about this and requested him about clarification. He never gets back to me on this issue.

I strongly believe that besides discrimination, my rights as American Citizen was violated regarding Freedom of Speech.

5. August 9, 2016

The OBO field office has several problems (noted above in item no. 2) including roof leaking, condensation due to faulty air-conditioning system, swelled floor due to poor design and start growing fungus at ceiling panels. I pointed out this again and he get very upset and make the statement quote, **"Do you want to go back to United States"**. I was shocked again and consider this as a serious threat. It was getting difficult to perform my duties to the best of my abilities in threatening and hostile environment and due to his continuous humiliating and discriminative behavior.

6. September 7, 2016 – Most Recent Event

At the end of workday, I was walking with another SRC engineer Nisar Alvi to return to my apartment outside the US Consulate. He instructed the security to take all US government property away from me at the gate. Nisar Alvi reacted immediately that this is not an appropriate way to treat the cleared American professionals. Finally Steve Brda retaliated and removes me from the project site six month earlier than our contract with DOS/OBO.

7. May 17, 2016 – Meeting with Office of Inspection General (OIG)

Refer to the attached pages. Steve Foster/OBO CM, McSherry Catherine/Post Management Officer, Patrick Mill/Post RSO and Nisar Alvi/SRC 3rd party contractor has the knowledge that Murad Qayyum has arranged meeting with OIG. Steve Foster made few attempts and inquired quote, **"What you want to report to OIG"**. The OIG officer met with Steve Foster in OBO field office. The OIG officer left the post without meeting with Murad Qayyum. Refer to the attached pages.

I was intended reporting to OIG, the following items.

- 7.1 I have noticed conflict between DOS/OBO polices regarding engineering, design and construction and due to conflicting polices, US tax dollars were being wasted. **I have documented evidences.**
- 7.2 SRC inc. was involved bribing the General Contractor's (Epik) to obtain the visa for his employee Jim Benson (electrical engineer). The original visa for Pakistan Karachi was issued to Jim Benson for 30-days in Washington DC. The 2nd time visa was issued for 90-

days from Pakistan Islamabad and 3rd time the visa was issued for 12-months from Islamabad Pakistan.

The other SRC Inc. employee Nisar Alvi, OBO PD Steve Brda and OBO/CM Steve Foster has the full knowledge about bribing the contractor and Jim Benson informed us in the meeting.

General Contractor (Epik) claimed that they are expecting that Jim Benson will help them in return. I raised the concern that this approach is illegal, creating conflict of interest. Jim Benson was protecting the contractor's interest instead of US Government. This was against the DOS/OBO policies and US laws.

SRC Inc. was the primary beneficial from these illegal activities and billed to US Government for the extended stay of Jim Benson (about half million dollars). Unfortunately I was the victim of this conflict of interest. Both SRC and DOS/OBO retaliated against me and removed me from the site.

- 7.3 I do not want to speak for others, however upon investigation there will be many witnesses and evidences, which will confirm Steve Brda's aggressive attitude, humiliating others and creating hostile working environment. Recently he made statement in the meeting that he does not like Epik's management team and he is humiliating them in the meeting on purpose.

In fact behind the curtain, Steve Brda and Steve Foster were involved socializing with the design-build contractor Epik on a regular basis. Steve Brda was buying the beer and wine using his credit card from US Consulate Commissary. The security coordinator Matt was facilitating the travel and other arrangements. Nisar Alvi and I raised the concern that socializing with the contractor on regular basis falls under Conflict of Interest Clause. Steve Brda's response was quote, "I do not care".

I witnessed the following participants in the Social get together on a regular basis.

Steve Brda / OBO

Steve Foster / OBO

Matt Hamersville / SRC Inc 3rd party contractor

Hakan Aanas / Epik Management

Cafer / Epik Management

Ibrahim / Epik Managements

Neilsoy / Epik's Management

- 7.5 Steve Brda forced me over my objection to sign the Contractor's Quality Control Reports. I raised the question that under Design-Build contract requirements, this is ill legal to sign the Contractor Quality Control reports. I inquired from him that in my absence, you shall sign these reports and he refused.

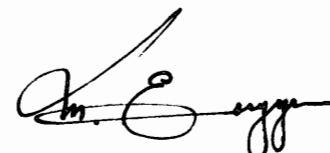
Later on Steve Brda wrote e-mail to my supervisor Stacy Price and complained that Murad is not signing Contractor Quality Control reports and he is not participating in the inspection. He was trying to collect and use evidence against me so that he can justify removing me from the site. **Documented evidences are available.**

7.6 The issues were discussed in and outside the meetings. OBO Steve Brda and Steve Foster were aware of the facts that Murad Qayyum has documented the issues and he is planning to report to OIG and EEO. On September 1, 2016, after work hours my desktop was crashed. Upon inquiry, Steve Foster blamed Electric Power Surge. It was a suspicious act because other 22 computers and equipment were safe except my computer. The security/IT section removed the computer and I lost all data. Approximately one week later on September 7, 2016, I was removed from the site. This needs further investigation and verification.

8. As per SRC instructions, I submitted e-QIP application in June 2015 regarding to renew my security clearance (Top Secret). In August 2015 my employer SRC Inc. received my country clearance and allow me to deploy in Pakistan Karachi. In September 2016, I was removed from job assignment. SRC retaliated against me and stopped my security clearance process (Lost Jurisdiction) without my knowledge. I have not resigned and SRC has not terminated my employment (just abandoned), **Documented evidences are available.**

The client DOS/OBO (Steve Brda, Steve Foster) and employer SRC's discriminative attitude has caused substantial financial damages to complainant. I am requesting and expecting a fair investigation and subsequently its reimbursement to the complainant. Refer to the financial damages on the attached page below. This does not include the attorney's fee and lost job opportunities, follow on assignments to US embassies worldwide from three (3) months to three (3) years

*****End of Memo*****

 3.30-17

DOS-0025-17

Page: 3 of 3

WRONGFUL CONTRACT EMPLOYMENT TERMINATION

FININCIAL DAMEGES

After negotiations between employee Murad Qayyum and the employer SRC Inc., agreed and accepted the offer based on 18-months duration in Karachi Pakistan and follow on assignment from 3-month to 3-years with DOS/OBO worldwide.

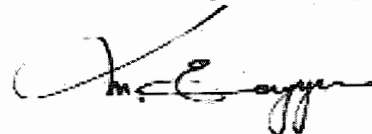
Following is the summary of Financial Damages due to wrongful contract employment and illegal act of the client and the employer.

| | | |
|-----|---|--------------|
| 1. | Annual Base Salary as per employment agreement: | \$100,008.00 |
| 2. | Hardship Pay on Base Salary: | 30% |
| 3. | Danger Pay on Base Salary: | 35% |
| 4. | Housing Allowance Per Month: | \$4,000.00 |
| 5. | Lost Base Salary Six Months and 15-Days: | \$54,171.00 |
| 6. | Lost Hardship Pay 30% on Base Salary: | \$16,251.30 |
| 7. | Lost Danger Pay 35% on Base Salary: | \$18,959.85 |
| 9. | Lost Apartment Furnishing/Households: | \$8,850.00 |
| 10. | Lost Housing Allowance 6-months & 15-days: | \$26,000.00 |
| 11. | Lost Follow on assignment as per contract agreement with DOS/OBO from 3-month to 3-years (Average \$150,000 per year x 3-years) | \$450,000.00 |
| 12. | Emotional Distress due to hostile work environment: | \$150,000.00 |

TOTAL CLAIM: \$724,232.00

"X"

"This is the end of my statement and nothing else follow!"

 3-30-1

EEO investigative Affidavit for Compensatory Damages*Note: Not applicable to Age Discrimination in Employment Act (ADEA) claims*

| | | | |
|----------------------|-------------------------|---------------|-------------------|
| Name Murad Qayyum | Case No. DOS-0025-17 | Page No. 1 | No. of pages 3 |
|----------------------|-------------------------|---------------|-------------------|

Instructions for the Complainant

During an investigation into alleged discrimination, the Investigator is required to gather evidence regarding appropriate remedies, which may include compensatory damages. The remedy that you are seeking to resolve this complaint includes your claim that you are entitled to receive a monetary award. Therefore, you must provide testimony and evidence concerning the nature, extent and severity of the harm you suffered due to the alleged discriminatory conduct. This form contains a number of questions and/or statements regarding your claim for damages. Please read the questions or statements carefully before responding. If you need additional space, please use an additional sheet(s). *You must declare under penalty of perjury that the information you provide on this form including any attached sheets is true and correct.*

1. I experienced financial difficulties because of the discriminatory act(s) alleged in my complaint.

☒ Yes ☐ No

If yes, provide full explanation. Please include description and cause of difficulty (or difficulties) when occurred, duration of occurrence, and how severe.

I lost my bi-weekly income after 09/15/2016 and gradually start feeling pressure due to not making the payments on time. I will not be able to support my two sons. Both were in college as full time student and now they will attend the college as part time. I am planning to sell one vehicle and will keep only two for 4-family members. With the passage of time, the financial difficulties may go from bad to verse. I am working hard to find another job or an alternate source of income but still out of luck.

"X"

"End of statement"

2. I experienced personal medical problems because of the discriminatory act(s) alleged in my complaint.

☒ Yes ☐ No

If yes, provide full explanation. Please include description and cause of problems, when occurred, duration of occurrence, and severity.

I am suffering from depression and anxiety.

"X"

"End of statement"

3. I obtained psychological or psychiatric counseling because of the discriminatory act(s) alleged in my complaint.

☐ Yes ☒ No

If yes, provide full explanation. Include description of when, the cause, its extent and severity.

I am not obtaining any psychological counseling.

"X"

"End of statement"

4. I have had to take medication because of the discriminatory act(s) alleged in my complaint.

☐ Yes ☒ No

If yes, list type of medication, reason for the medication, and the cost of the medication.

I am not taking any medication.

"X"

"End of statement"

| | | | |
|----------------------|-------------------------|---------------|-------------------|
| Name Murad Qayyum | Case No. DOS-0025-17 | Page No. 2 | No. of pages 3 |
|----------------------|-------------------------|---------------|-------------------|

5. Did any of the difficulties for which you checked "Yes" in items 1-4 exist prior to the act(s) of discrimination alleged in your complaint?

☐ Yes ☒ No

If yes, please complete question 6 below.

6. Describe for each pre-existing condition how that condition was made worse by the act(s) of discrimination alleged in your complaint. Begin each description with the item number of page 1 (items 1 through 4) to which it pertains.

None.

"X"

"End of statement"

7. Is there any other information or evidence regarding your claim for entitlement to compensatory damages that you want to include with this affidavit?

☒ Yes ☐ No

If yes, please provide a full explanation of the information you wish to include. Attach additional pages if necessary.

Refer to the attached list of compensatory damages.

"X"

"End of statement"

IMPORTANT!

You must attach or provide the investigator with copies of documentation, such as bills, doctor's statements, pharmacists' bills, statements from other persons, or other paperwork relevant to the difficulty that you claim is related to the discriminatory act(s) alleged in your complaint. If you do not have copies of your documentation, you may provide the original to the investigator who will copy relevant records and return the original documents to you. Alternatively, for medical information and records, you may provide a signed authorization from your health care provider to the investigator permitting him/her to obtain information directly from your health care provider or pharmacy. Or, you may sign a medical information release provided by the investigator if you prefer.

Privacy Act Notice

Privacy Act Notice. The collection of this information is authorized by The Equal Employment Opportunity Act of 1972, 42 U.S.C. 2000e-16; The Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. 633a; The Rehabilitation Act of 1973, as amended, 29 U.S.C. 794a; and executive Order 11478, as amended. The information will be used to adjudicate complaints of alleged discrimination and to evaluate the effectiveness of the EEO program. As a routine use, this information may be disclosed to an appropriate government agency, domestic or foreign, for law enforcement purposes; where pertinent, in a legal proceeding to which the Agency is a party or has an interest; to a government agency in order to obtain information relevant to an agency decision concerning employment, security clearances, contracts, licenses, grants, permits or other benefits; to a government agency upon its request when relevant to its decision concerning employment, security clearances, security or suitability investigations, contracts, licenses, grants or other benefits; to a congressional office at your request; to an expert, consultant, or other person under contract with the Agency to fulfill an agency function; to the Federal Records Center for storage; to the Office of Management and Budget for review of private relief legislation; to an independent certified public accountant during an official audit of Agency finances; to an investigator, administrative judge or complaints examiner appointed by the Equal Employment Opportunity Commission for investigation of a formal EEO complaint under 29 CFR 1614; to the Merit Systems Protection Board or Office of Special Counsel for proceeding or investigations involving personnel practices and other matters within their jurisdiction; and to a labor organization as required by the National Labor Relations Act. The information requested through this form is voluntary for the complainant and for non-Federal Agency employees. Federal Agency employees, pursuant to 29 Code of Federal Regulations § 1614.109 (c)(1) and (c)(3), are required to cooperate and shall produce such documentary and testimonial evidence as the investigator deems necessary.

I declare under penalty of perjury that the foregoing, including any attached sheets, is true and correct.

Affiant's Signature



Date Signed

3-30-17